

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual,

Plaintiff,

Civil Action No. 1:24-CV-24228-CMA

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

JOINT [PROPOSED] VERDICT FORM

Pursuant to the Court's Amended Case Management and Scheduling Order (ECF 62), Plaintiff Megan Pete ("Ms. Pete") and Defendant Milagro Cooper ("Ms. Cooper") respectfully submits their proposed verdict form.

The parties respectfully reserve the right to amend their proposed verdict form prior to the time it is given to the jury, depending on the evidence received at trial, the Court's rulings, or any other factors that preclude a definitive submission at this time.

Dated: Miami, FL
November 14, 2025

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JOINT [PROPOSED] VERDICT FORM

In answering the following questions and filling out this Verdict Form, you are to follow the Court's Final Instructions to the Jury and any instructions provided in this Verdict Form. Your answer to each of the following must be unanimous.

We, the jury, unanimously answer the questions submitted to us as follows:

I. **MS. PETE’S CLAIMS**

COUNT ONE: DEFAMATION *PER SE*

Question 1: Do you find, by a preponderance of the evidence, that Ms. Cooper defamed Ms. Pete by accusing Ms. Pete of perjury—a felony—by lying under oath in a criminal trial?

Yes _____

No _____

Regardless of whether your answer is “Yes” or “No,” proceed to “Count Two: Promotion of An Altered Sexual Depiction.”

COUNT TWO: PROMOTION OF AN ALTERED SEXUAL DEPICTION

Question 2: Do you find, by a preponderance of the evidence, that Ms. Cooper willfully and maliciously promoted, without Ms. Pete's consent, a visual depiction of Ms. Pete that she knew or reasonably should have known was an altered sexual depiction?

Yes _____

No _____

Regardless of whether your answer is "Yes" or "No," proceed to "Count Three: Intentional Infliction of Emotional Distress."

COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Question 3: Do you find, by a preponderance of the evidence, that Ms. Cooper intentionally or recklessly engaged in extreme and outrageous conduct toward Ms. Pete?

Yes _____

No _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining question under “Count Three: Intentional Infliction of Emotional Distress,” and proceed to “Damages.”

Question 4: Do you find, by a preponderance of the evidence, that Ms. Pete suffered severe emotional distress as a result of Ms. Cooper’s extreme and outrageous conduct?

Yes _____

No _____

DAMAGES

If you answered “Yes” to Question 1, Question 2, or Questions 3 & 4, proceed to the next question. If your answer is “No,” skip the questions under “Damages,” and sign the Verdict Form.

Question 5: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper?

Yes _____ No _____

If your answer is “Yes,” in what amount: _____

If you answered “No” to Question 5, proceed to the Question 6. If you answered “Yes” to Question 5, skip Question 6 and proceed to Question 7.

Question 6: If you found that Ms. Pete is not entitled to compensatory damages, do you find, by a preponderance of the evidence, that Ms. Pete should be awarded nominal damages against Ms. Cooper?

Yes _____ No _____

If your answer is “Yes,” in what amount: _____

Regardless of whether your answer is “Yes” or “No,” proceed to the next question.

Question 7: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete’s defamation and/or intentional infliction of emotional distress claims?

Yes _____ No _____

If your answer is “Yes,” in what amount: _____

Signed: _____

Presiding Juror

Dated: _____

You are finished. Please ensure the Verdict Form accurately reflects your unanimous decisions. Once signed by the Jury Foreperson, please notify the Court’s Clerk that you have reached a verdict. The Jury Foreperson should maintain possession of this Verdict Form and bring it when the jury is brought back into the Courtroom.